

# LAW OFFICES OF BOBBI C. STERNHEIM

212-243-1100 • Main  
917-306-6666 • Cell  
888-587-4737 • Fax

33 West 19th Street - 4th Floor  
New York, New York 10011  
bc@sternheimlaw.com

March 16, 2021

Honorable Alison J. Nathan  
United States District Court  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*  
20 Cr. 330 (AJN)

Dear Judge Nathan:

On behalf of our client, Ghislaine Maxwell, we respectfully submit the Reply Memorandum of Ghislaine Maxwell in Support of Her Third Motion for Bail (the “Bail Reply”) and accompanying exhibit. The Bail Reply contains references to the government’s Omnibus Memorandum in Opposition to Ms. Maxwell’s Pre-trial Motions (the “Pretrial Motion Opposition”) for which a ruling regarding redactions is pending. Until these redactions are finalized, we are uncertain whether any redactions to the Bail Reply will be necessary.

For now, we hereby submit by email to the Court and government the unredacted Bail Reply pursuant to Rule 2(B) of the Court’s individual rules of criminal practice. Should any redactions to the Bail Reply be required after the Court rules on the redactions to the Pretrial Motion Opposition, we will at that time submit two versions of the Bail Reply to the Court: an unredacted original to be filed under seal and a version for public filing containing the required redactions.

Please contact me with any questions. Your consideration of this request is greatly appreciated.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: Counsel for all parties